

## Meeting Questions and Answers:

**Subject: PHMSA New LNG Incident and Annual Reports Webinar**

**Start Time: Tuesday, June 14, 2011 1:30:00 PM GMT-4:0**

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**Question:** What is a stranded utility?

**Answer:** A stranded utility system is typically small and too far from the pipeline grid to be economically connected. All gas is brought in to the facility. It can also be a source of gas with no way to pipe it out ... so it gets moved in liquid form to another location.

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**Question:** Is there a simple gallon equivalent to the 3,000 MCF reporting requirement rule that PHMSA uses? Since LNG is a liquid.

**Answer:** It can vary with different compositions of LNG but usually, use 618 cubic feet gas /cubic feet of liquid; 7.48 gallons/cubic foot.

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**Question:** If you can receive LNG by truck as well as having a liquefaction process, would you only enter liquefaction?

**Answer:** You should be able to enter or check both situations.

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**Question:** Is only ESD activation by an incident required to be reported? No need to report maintenance functions?

**Answer:** On ESD activation we are looking for ESD shutdowns that are actual emergencies. Shutdowns not part of an emergency are not what we are looking for here.

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**Question:** Can you give an example of an LNG insulation degradation incident.

**Answer:** If you have for instance a 9-nickel inner tank for storage and part of a carbon steel outer tank with insulation between them and your insulation for instance if its perlite and you end up with an area with no insulation then you can get cold spots on the outer tank and can get damage from that. You can also have similar things that happen in the piping area of the plant

and the insulation is keeping the temperature separated. You can get insulation degradation problems with or without actually having an incident as well. That is one of the things 193 asks you to look for on the tank.

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**Question:** If you roll over and empty an entry LNG transport trailer that is 10K-13K gallons (roughly 1000mcf), that is not considered an "incident" to be filed? Or is that then considered a leak?

**Answer:** that is an LNG transport so those aren't under the same regulations in transport as those for a facility; although part of DOT, (maybe Hazmat but not pipeline regulations), instead its regulations for those moving on the road.

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**Question:** On part B of the form, Date placed in service for one plant, our plant has 3 different dates, can you explain that portion of the form, We have one plant, same location, same OPID, with 3 different start up dates due to expansion. therefore the dates put in service will be different.

**Answer:** The form only accommodates one date per facility/plant; therefore, please enter the earliest date.

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**Question:** We are a conglomerate of legacy plants. Is OpID the same for all or different and based upon legacy company?

**Answer:** We have some flexibility on how you may choose to conglomerate assets under OPIDS. Our OPID Registry effective Jan 2012 will cover that but at this point in time, we suggest you consolidate where reasonable under an existing OPID. If you report LNG facilities to the NPMS use the same OPID you use to report to the NPMS.

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**Question:** What would be the "function" of an LNG peak-shaving facility on a transmission system (other than peak-shaving, which isn't an option for selection). Perhaps, "storage"?

**Answer:** under the type of LNG plant facility you have Peak Shaving and the function you are correct might be storage, it might be storage with liquefaction, or without liquefaction, or both. Although the overall function is peak shaving, we wanted to keep track of whether you had liquefaction or not.

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**Question:** Will latitude and longitude data be removed from the incident report form similar as the annual report form? Based on similar rationale as noted in 5/4/2011 letter from Mr Wiese to AGA.

**Answer:** We will remove lat/long from the incident form at a later date. If there should be a reportable incident before we do so, we will redact that information from public access.

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**Question:** For the location - lat and long, what format for the GPS coordinates?

**Answer:** Lat/long was removed from the hazardous liquid annual report. In the unlikely event that a reportable LNG incident needs to be filed, refer to the LNG incident form instructions. We are considering removing lat/long from the LNG incident report in the near future as well.

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**Question:** What constitutes an LNG or gas leak quantitatively?

**Answer:** There is some guidance on that in the presentation and also in the instructions. The unintentional loss of 3,000 MCF or more was added to the definition for gas incident reporting, which quantifies it. That could be a liquid leak in terms of the gas, or a gas leak at the facility. The definition of an incident also has other triggers (death, injury requiring in-patient hospitalization, \$50,000 in property damage excluding cost of gas lost).

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**Question:** I think we have just one OPID for both our transmission system and our LNG Plant. Can we submit an annual report for both with the same OPID?

**Answer:** Yes, you can use the same OPID to submit your Gas Transmission and LNG Annual Reports.

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**Question:** Will the PowerPoint presentation be available?

**Answer:** The presentation, closed caption video, and Q&A files will all be available on the PHMSA website under the Pipeline Safety Community Library.

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**Question:** In the future, will we be able to enter the portal and then select which OpID to work with, and be able to switch between OpIDs within the portal? I will be working with 9 OpIDs.

**Answer:** In the future, we hope to restructure the function of selecting operator IDs, so that it is not necessary to log out to select a different operator.

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**Question:** Are the reports viewable and editable for all users within an OPID

**Answer:** Yes, any saved or submitted report can be edited or viewed by anyone with access to the OPID.

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**Question:** If we created a Portal ID for the Distribution Report filing in March, will that still work on the new version of the Portal or do we need to recreate it?

**Answer:** No, once you create an account in the Portal, you will not be permitted to create another. We have tried to simplify things by not making operators remember multiple usernames and passwords. Accounts are limited to one account per email address. You will have to reset your password according to DOT's Security Policy, which is every 90 days. If you do not use your account again until next filing period, you will be required to change your password at that time.

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**Question:** Where is the OPID and ODES found?

**Answer:** You can request an OPID in ODES, which is at <http://opsweb.phmsa.dot.gov>

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**Question:** Can any user change a draft report created by another user within the same company?

**Answer:** Yes, any saved (draft) or submitted report can be edited or viewed by anyone with access to the OPID.

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**Question:** What is an "ODES Pin"?

**Answer:** An ODES PIN is associated with an Operator ID that is provided by PHMSA. You will need it to register to the Portal. You can request it by going to [https://opsweb.phmsa.dot.gov/cfdocs/opsapps/pipes/operator\\_pin\\_request.cfm](https://opsweb.phmsa.dot.gov/cfdocs/opsapps/pipes/operator_pin_request.cfm)

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**Question:** Will operators be required to change passwords every 90 days?

**Answer:** Yes, you will have to reset your password according to DOT's Security Policy, which is every 90 days. If you do not use your account again until next filing period, you will be required to change your password at that time.

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**Question:** Can a signature block be added to the form when we convert it to PDF for internal company signing? This will let us send a signed form to our local Public Service Comm.

**Answer:** The application and corresponding PDF will only contain the data that is in the approved OMB form. You can print a copy of the form and sign it prior to sending it over to whomever.

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**Question:** Is it still required to send a hard copy of the annual report to the state agencies where our facility is located?

**Answer:** This depends on the requirements given by your State Agency. This is not a PHMSA requirement.